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5.16 WORKER HEALTH AND SAFETY

5.16.1 Introduction

This Application for Certification (AFC) for the Rio Mesa Solar Electric Generating Facility (Rio Mesa SEGF or Project) has been prepared in accordance with the California Energy Commission's (CEC) Power Plant Site Certification Regulations (CEC-140-2008-001-REV1, current as of July 2008). In addition, this AFC includes elements necessary for the United States (U.S.) Bureau of Land Management (BLM) to permit the Project through the National Environmental Policy Act (NEPA). The "Applicant" for purposes of this AFC comprises Rio Mesa Solar I, LLC, Rio Mesa Solar II, LLC, and Rio Mesa Solar III, LLC, owners of the three separate solar plants and certain shared facilities being proposed. These three Delaware limited liability companies will hold equal one-third shares in the ownership of shared facilities and will separately own their respective plants. They are wholly owned by Rio Mesa Solar Holdings, LLC (a Delaware limited liability company) which is in turn wholly owned by BrightSource Energy, Inc. (BrightSource) a Delaware corporation and the ultimate parent company. The Applicant will use BrightSource's solar thermal technology for the Rio Mesa SEGF.

The proposed project site is situated on the Palo Verde Mesa in Riverside County, California, 13 miles southwest of the City of Blythe, and is located partially on private land and partially on public land administered by BLM. The project will include three solar concentrating thermal power plants and a shared common area to include shared systems. The first plant, a 250 megawatt (MW) (nominal) facility known as Rio Mesa I, will be constructed at the south end of the project and owned by Rio Mesa Solar I, LLC. The second plant, another 250 MW (nominal) facility known as Rio Mesa II, will be located in the central portion of the project site and owned by Rio Mesa Solar II, LLC. Rio Mesa III, a third 250 MW (nominal) facility, will be constructed in the northern portion of the project site and owned by Rio Mesa Solar III, LLC. These three plants will be connected via a common overhead 220 kilovolt (kV) generator tie-line (gen-tie line) to the Southern California Edison (SCE) Colorado River Substation (CRS) approximately 9.7 miles to the north.

Each plant will utilize a solar power boiler (referred to as a solar receiver steam generator or SRSG), located on top of a dedicated concrete tower, and solar field based on proprietary heliostat mirror technology developed by BrightSource. The reflecting area of an individual heliostat (which includes two mirrors) is about 19 square meters [205 square feet (sq. ft.)]. The heliostat (mirror) fields will focus solar energy onto the SRSG which converts the solar energy to superheated steam. In each plant, a Rankine cycle non-reheat steam turbine receiving this superheated will be directly connected to a rotating generator that generates and pushes the electricity onto the transmission system steam. Each plant will generate electricity using solar energy as its primary fuel source. However, auxiliary boilers will be used to operate in parallel with the solar field during partial load conditions and occasionally in the afternoon when power is needed after the solar energy has diminished to a level that no longer will support solar generation of electricity. These auxiliary boilers will also assist with daily start-up of the power generation equipment and night time preservation.

This subsection describes the applicable laws, ordinances, regulations, and standards (LORS) related to hazardous materials handling activities related to the project. It provides an analysis of the Project impacts that could occur as a result of Project construction and operation. This subsection also presents protection

and mitigation measures that will avoid, minimize, or compensate for adverse impacts, when required. A list of agency contacts and permits that will be required is included at the end of the subsection.

5.16.2 Laws, Ordinances, Regulations, and Standards

The following paragraphs describe the LORS that are applicable to the Rio Mesa SEGF in the context of the occupational safety and health protection measures. Public health LORS are addressed in Section 5.9, Public Health and Safety. LORS applicable to worker safety are summarized in Table 5.16-1.

Table 5.16-1
Laws, Ordinances, Regulations and Standards (LORS)

LORS	Applicability	Conformance (AFC Section)
Federal		
National Environmental Policy Act (NEPA) of 1969	NEPA establishes a public, interdisciplinary framework for Federal decision-making and ensures that federal agencies take environmental factors into account when considering federal actions.	5.16.2.1
Occupational Health and Safety Act of 1970, 29 USC 651 et seq.; 29 CFR 1910 et seq.; 29 CFR 1926 et seq.	Meet employee health and safety standards for general industry and the construction industry.	5.16.2.1
Department of Labor, Safety and Health Regulations for Construction Promulgated Under Section 333 of the Contract Work Hours and Safety Standards Act, 40 USC 327 et seq.	Meet employee health and safety standards for construction activities. Requirements addressed by Title 8 CCR, General Construction Safety Orders.	5.16.2.1
NFPA	Meet standards necessary to establish a reasonable level of safety and property protection from the hazards created by fire and explosion.	5.16.2.1
State		
Warren-Alquist State Energy Resources Conservation and Development Act, California Public Resources Code, § 25000, et seq.	Gives the California Energy Commission (CEC) licensing authority in lieu of state, regional, and local permits and requirements.	5.16.2.2
California Environmental Quality Act (CEQA) California Public Resources Code, Division 13, §§ 21000-21177, as amended 2010.	Requires all agencies of State government that regulate activities of private individuals, corporations, and public agencies, which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage.	5.16.2.2
Title 8 CCR	Meet requirements for a safe and hazard-free work environment. Categories of requirements include General Industry Safety Orders, General Construction Safety Orders, and Electrical Safety Orders.	5.16.2.2

Table 5.16-1
Laws, Ordinances, Regulations and Standards (LORS)

LORS	Applicability	Conformance (AFC Section)
California Clean Air Act, California Health and Safety Code Section 39650 et seq.	Meet requirements for best available control technology to minimize exposure limits to toxic air pollutants and possible risk assessments for carcinogen pollutants.	5.16.2.2
California Health and Safety Code Section 25500–25541; 19 CCR Sections 2720–2734	Estimate emissions for listed air toxic pollutants and submit inventory to air district for major sources of criteria air pollutants. Follow-up from air district may require a health risk assessment.	5.16.2.2
Local		
Riverside County DEH, HMMD	Provide implementation of the Hazardous Materials Business Plan and Risk Management Plan	5.16.2.3
RCFD Fire Code Standards (Ordinance 787.6)	Adopts the 2010 edition of the California Fire Code.	5.16.2.3

Sources: California Department of Industrial Relations, 2011; California Department of Toxic Substances Control, 2011; California Environmental Protection Agency (Cal-EPA), 2011; Riverside County, DEH, HMMD, 2011; RCPD, 2011; Mojave Air Quality Management District, 2011.

AFC	=	Application for Certification	HMMD	=	Hazardous Materials Management Division
Cal-OSHA	=	California Department of Occupational Safety and Health Administration	LORS	=	Laws, Ordinances, Regulations, and Standards
			NEC	=	National Electric Code
CCR	=	California Code of Regulations	NFPA	=	National Fire Protection Association
CFR	=	Code of Federal Regulations	OSHA	=	Occupational Health and Safety Administration
DEH	=	Department of Environmental Health	RCFD	=	Riverside County Fire Department
DIR	=	Department of Industrial Relations	USC	=	United States Code

5.16.2.1 Federal

Rio Mesa SEGF will comply with all federal LORS by developing appropriate plans and policies as well as by implementing the measures described in Section 5.16.4.1. The federal LORS applicable to the Project are described below.

National Environmental Policy Act of 1969

The National Environmental Policy Act (NEPA) establishes a public, interdisciplinary framework for Federal agencies reviewing projects under their jurisdiction to consider environmental impacts. NEPA's basic policy is to assure that all branches of government give proper consideration to the environment prior to undertaking any major federal action that significantly affects the environment.

The Bureau of Land Management (BLM), as lead Federal agency for the Project, is responsible for preparation of an Environmental Impact Statement (EIS) in compliance with NEPA to evaluate the environmental impacts of the portions of the Rio Mesa SEGF on federal lands. The Rio Mesa Solar III plant and the Project gen-tie line are located on lands administered and managed by the BLM. NEPA compliance is required for these portions of the Project through preparation of a Draft and Final EIS.

BLM is also responsible for Native American consultation, including government to government consultation.

Occupational Safety and Health Act of 1970 (OSHA), 29 USC §§651 et seq.; 29 CFR §§1910 et seq.; and 29 CFR §§1926 et seq.

OSHA establishes occupational safety and health standards (§1910) (e.g., permissible exposure limits for toxic air contaminants [§1910.100], electrical protective equipment requirements [§1910.137], electrical workers safety standards [§1910.269], and the requirement that information concerning the hazards associated with the use of all chemicals is transmitted from employers to employees [§1910.1200]) and safety and health regulations for construction (§1926). Subpart I of §1910 and Subpart E of §1926 address personal protective equipment (PPE).

Under the Operational Status Agreement of October 5, 1989, between the federal OSHA and the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA), the state resumed full enforcement responsibility for most of the relevant federal standards and regulations, (55 Federal Register 18610 [July 12, 1990]; 29 CFR §1952.172). Federal OSHA has retained concurrent enforcement jurisdiction with respect to certain federal standards, including standards relating to hazardous materials at 29 CFR §1910.120 (*Id.*).

Department of Labor, Safety and Health Regulations for Construction Promulgated Under §333 of the Contract Work Hours and Safety Standards Act, 40 USC §§ 327 et seq.

This code establishes safety and health regulations for construction. The requirements for this regulation are addressed in Title 8 California Code of Regulations, Chapter 4, Subchapter 4, General Construction Safety Orders.

National Fire Protection Association

The National Fire Protection Association (NFPA) sets forth minimum standards to establish a reasonable level of fire safety and property protection from the hazards created by fire and explosion. The standards apply to the manufacture, testing, and maintenance of fire protection equipment. The NFPA also provides guidance on safe selection and design, installation, maintenance, and construction of electrical systems

5.16.2.2 State

The Rio Mesa SEGF will comply with all state LORS by developing appropriate plans and policies in addition to measures described in Section 5.16.4.1 and Section 5.16.6. California State LORS are described below.

Warren-Alquist Act

The California Public Resources Code (PRC) establishes the CEC as the decision-making authority over land use decisions and environmental determinations during the AFC process. This is in accordance with the Warren-Alquist Act, codified in §§ 25000 et seq. of the PRC. The CEC has exclusive jurisdiction

over thermal power plant siting (50 MW or greater), including CEQA implementation. The Project will demonstrate conformity with state, regional, and local laws, including land use laws.

Under the Warren-Alquist Act, the CEC's licensing process is legally equivalent to CEQA and is guided by CEQA regulations.

California Environmental Quality Act

The CEC will be the lead agency enforcing CEQA for the Project. Under California law, the CEC is responsible for reviewing the AFCs filed for projects, and also has the role of lead agency for the environmental review of these projects under CEQA (PRC, §§ 25500 et seq; PRC, §§ 21000 et seq.). The CEC conducts this review in accordance with the administrative adjudication provisions of the Administrative Procedure Act (5 United States Code, §§ 500 et. seq.) and its own regulations governing site certification proceedings (CCR, Title 20, §§ 1701 et seq.). These provisions require the staff to conduct an independent analysis of AFCs and prepare an independent assessment of a project's potential environmental impacts, feasible mitigation measures, and alternatives as part of this process.

The CEC considers the Staff Assessment(s), along with the environmental analysis provided by the Applicant, as well as input from interested local, regional, state, and Federal agencies, intervenors, and interested Native American tribes, in developing its final decision on whether to issue a license for a proposed project. The CEC has a certified regulatory program under CEQA that exempts the agency from having to draft an Environmental Impact Report (EIR) and, instead, requires a Final Staff Assessment (FSA), evidentiary hearings, and a decision based on the hearing record, which includes the staff's and other parties' assessments.

California Fire Code, Article 80

This article includes provisions for storage and handling of hazardous materials. Considerable overlap exists between this code and Chapter 6.95 of the California Health and Safety Code. However, the fire code contains independent provisions regarding fire protection and neutralization systems for emergency venting (§ 80.303, D, Compressed Gases). Other articles that may be applicable include Article 4, Permits, and Article 79, Flammable and Combustible Liquids.

Title 8, California Code of Regulations

Title 8 prescribes general occupational safety and health regulations and standards in addition to the construction and industrial safety regulations, standards, and orders. Applicable sections of CCR Title 8, Chapter 4, Subchapters 7 and 24 will be complied with during construction and operation of the proposed Project. Specifically, Title 8 CCR §1509 (Construction) and §3203 (General Industry) make numerous changes designed to redirect the emphasis of Cal-OSHA toward ensuring that employers have an effective work site Illness and Injury Prevention Plan (IIPP), to focus Cal-OSHA discretionary inspections in the highest hazard industries as determined by workers' compensation and other occupational injury data, and to limit the number of follow-up inspections that Cal-OSHA must perform. Title 8, CCR §5189 requires facility owners to develop and implement effective Safety Management Plans to ensure that large quantities of hazardous materials are handled and managed safely.

California Health and Safety Code, §25500

This code requires companies that handle hazardous materials in sufficient quantities to develop a Hazardous Materials Business Plan (HMBP). The HMBP includes basic information on the location, type, quantity, and health risks of hazardous materials handled, stored, used, or disposed of that could be accidentally released into the environment. This code also includes a plan for training new personnel and for annual training of all personnel in safety procedures to follow in the event of a release of hazardous materials. In addition, this code includes an Emergency Response Plan and identifies the business representative able to assist emergency personnel in the event of a release.

California Health and Safety Code, §25531

This code directs facility owners storing or handling acutely hazardous materials in reportable quantities to develop a Risk Management Plan (RMP) and submit the RMP to appropriate local authorities, the United States Environmental Protection Agency (EPA), and the designated local Administering Agency (AA) for review and approval. The RMP includes an evaluation of the potential impacts associated with an accidental release; the likelihood of an accidental release occurring; the magnitude of potential human exposure; any pre-existing evaluations or studies of the material; the likelihood of the substance being handled in the manner indicated; and the accident history of the material. This relatively new program supersedes the California Risk Management and Prevention Plan (RMPP) and is known as the California Accidental Release Program (CalARP). Rio Mesa SEGF does not intend to store any listed hazardous materials above thresholds that would require an RMP.

5.16.2.3 Local

Rio Mesa SEGF will comply with all local LORS. The Rio Mesa SEGF will develop a HMBP for construction and operation of the facility. In addition, Rio Mesa SEGF will maintain its compliance by updating the appropriate health and safety plans and policies as well as by implementing the measures described in Section 5.16.4.1.

Riverside County Department of Environmental Health, Hazardous Materials Management Division

The Riverside County Department of Environmental Health (DEH), Hazardous Materials Management Division (HMMD) provides for the implementation of the HMBP.

Riverside County Ordinance No. 787.6

Riverside County Ordinance No. 787.6 adopts the 2010 California Fire Code to regulate and govern the safeguarding of life and property from fire and explosion hazards (arising from the storage, handling, and use of hazardous substances, materials and devices) and from conditions hazardous to life or property in the occupancy of building and premises located in the County of Riverside.

5.16.3 Affected Environment

The project site consists of previously disturbed land. Unexploded ordnance (UXO) and munitions and explosives of concern (MEC) are potentially present on-site, as the military used much of the desert for training exercises during World War II.

Construction of the entire generating facility, from site preparation and grading to commercial operation, is expected to take place from the Fourth Quarter of 2013 to the First Quarter of 2016. Construction of the shared facilities will occur during construction of the first plant. Based on an approximate 36-month construction period, there will be an average and peak workforce of approximately 1,040 and 2,500, respectively. The workforce will consist of construction craft people, supervisory, support, and construction management personnel. The peak construction site workforce level is expected to occur in Month 21. During some construction periods and during the start-up phase of the project, some activities will occur 24 hours per day, 7 days per week.

Management, engineering, administrative staff, skilled workers, and operators will serve all three plants. Rio Mesa SEGF is expected to employ up to 150 full-time employees: 30 with Rio Mesa I, 30 with Rio Mesa II, and 30 with Rio Mesa III, as well as 60 for the common area. The facility will be operated 7 days a week, typically up to 16 hours per day.

5.16.4 Environmental Consequences

The following sections discuss the potential environmental consequences associated with the proposed Project.

5.16.4.1 Occupational Health and Safety

Construction activities may expose workers to the hazards identified in Table 5.16-2. Exposure to these hazards can be minimized through adherence to appropriate engineering design criteria and administrative controls, use of applicable PPE, and compliance with all applicable health and safety LORS. The programs, regulations, and preventive measures intended to control potential worker health and safety impacts associated with these hazards are described in the remainder of this section. These elements provide a comprehensive health, safety, and fire prevention program and an accident/injury prevention program intended to ensure healthful and safe operations at the facility. With implementation of this program, construction and operational activities associated with the Project will not result in any significant environmental impacts to health and safety.

Construction Health and Safety Program

To protect the health and safety of workers during construction, the Applicant (or construction contractor) will ensure compliance with the Construction Health and Safety Program, and all federal, state, and local health standards that pertain to worker health and safety.

Table 5.16-2
Potential Worker Hazards during Project Construction

Activity	Potential Hazard
Elevated work	Slips/trips/falls
Hot work (welding/cutting)	Flash burns, explosion, thermal burns, toxic welding fumes
Excavations	Excavation/trench wall collapse, spoil movement, oxygen deficiency, buildup of toxic gases, fumes, vapors, dusts or mists, wet exposures, crushing hazards, confined spaces, potentially contaminated soil/waste
Solar power tower construction work	Slips/trips/falls, protruding objects, punctures, and lacerations
Equipment operation - motor vehicle and heavy equipment use	Noise exposure, vehicle accidents, load hazards, induced current
Transmission lines/ transformer station (working on electrical equipment and systems)	Slips/trips/falls, contact with live electricity and energized equipment, electrocution, flash burns
Painting	Paint solvents, paint vapors, chemical burns, fire/explosion, and slips/trips/falls
Abrasive blasting	Dust, flying particles, pressure vessels, noise
Powered hand tools	Noise, dust, flying particles, cuts, amputation, crushing
Fueling and working with flammable and combustible liquids	Fire, explosion, spills, environmental contamination
Construction and testing of high-pressure steam and air systems	Injury from failure of pressurized system components or unexpected pressure release
General construction activities	Heat and cold stress, biological hazards (e.g., Valley Fever, snakes, scorpians, spiders, badgers), noise exposure, dust exposure, injury to head, eyes, face, body, foot, and skin, ergonomic injuries, exposure to hazardous materials or UXO/MEC.

Source: California Department of Industrial Relations, 2011

Injury and Illness Prevention Program for Project Construction

The Construction Health and Safety Program will meet the Cal-OSHA IIPP requirements. Required components of the IIPP are described below.

- A written Code of Safe Practices that relates to construction activities.
- Identification of the person or persons responsible for implementing the program.
- Posting of the Code of Safe Practices at a conspicuous location at each job site office or providing it to each supervisor who shall have it readily available.
- A system for identifying workplace hazards that includes inspections.
- A system of verifying employee and subcontractor compliance.

- "Toolbox" or "tailgate" meetings that supervisors conduct with employees to discuss job hazards and mitigation measures.
- Methods of communicating with employees that encourage employees to expose unsafe activities.
- Procedures for correcting unsafe conditions.

When workers are first employed with the Project, they will be instructed regarding the hazards and safety precautions applicable to the type of work. Workers will also be directed to read the Code of Safe Practices. When employees are required to work near known job site hazards, they will be instructed in hazards recognition, the procedures for protecting themselves from injury, and the first-aid procedures in the event of injury.

Written Health and Safety Programs for Project Construction

Written safety programs that will be implemented in conjunction with the Code of Safe Practices are listed below.

- Accident/incident reporting procedures
- Blood-Borne Pathogens Exposure Control Program
- Procedures for use of compressed gas and air-handling systems
- Confined-space entry procedures
- Contractor Safety Program
- Electrical safety procedures
- Emergency Action Plan/Emergency Response Plan
- Emergency response procedures
- Excavation, Trenching, and Shoring Program
- Fall Protection Program
- Fire Protection and Prevention Plan
- First-Aid/Cardiopulmonary Resuscitation/Automated External Defibrillator Program
- Hand tools and equipment guarding safety procedures
- Hazard Communication Plan (including Proposition 65 requirements)
- Hazardous materials handling procedures
- Hazardous waste awareness training
- Hearing Conservation Program
- Heat Stress Protection Plan
- Heavy equipment procedures

- Hoist/chain/wire rope/webs/rope slings/crane procedures
- Hot Work Program (welding, cutting, and brazing)
- Industrial Hygiene Program
- Industrial truck (forklift) safety
- Ladders, scaffolds, and work platforms
- Lockout/Tag-out Program
- Motor vehicle safety
- PPE Program
- Portable electric and pneumatic tools
- Preventing slips, trips, and falls
- Repetitive stress injuries/ergonomics/lifting hazards
- Respiratory Protection Program
- Safety and Housekeeping Inspection Program
- Safety Committee and toolbox tailgate safety meetings
- Security Program
- Signs, tags, and barricades
- Tools (power- and hand-operated)
- UXO Identification, Training and Reporting Plan

PPE Program for Project Construction

Employees will be instructed on the proper use of PPE during construction activities. Required PPE will be approved for use, distinctly marked to facilitate identification, and used in accordance with the manufacturers' instructions. The PPE will be of such design, fit, and durability as to provide adequate protection against the hazards for which it is designed. The type of PPE required for each job task will be described in the Job Hazard Analysis (JHA) for that task. The PPE used at the Project may include, but will not necessarily be limited to the items specifically described in Table 5.16-3 and will comply with Cal-OSHA and National Institute of Occupational Safety and Health (NIOSH) requirements. When protective insulating equipment is used, such equipment will comply with the electrical safety codes.

A Respiratory Protection Program that complies with CCR Title 8, §5144 and General Industry Safety Order requirements will be developed, including respirator training, fit testing, monitoring, and selection.

Table 5.16-3
Basic Protective Equipment Guide

Body Area	Hazards	Recommended Protection
Eyes/face	Low-velocity flying particles	Safety glasses with side shields
	High-velocity chips and sparks	Impact goggles or safety glasses with full face shield
	Corrosive liquid splash during transfer	Splash proof goggles and face shield
	Welding: injurious light rays	Welding hood with appropriate eye filter lenses
Head/ears	General wear, overhead rigging, material handling, maintenance, and general construction processes	Hardhat
	High noise level	Earplugs or muff
Respiratory system	Low-hazard inert dusts	Dust mask
	Low-concentration solvent vapors	Cartridge-type organic vapor respirator
	Acid mists	Cartridge-type acid mist respirator
	High-concentration dusts or vapors	Airline respirator
	Oxygen deficiencies or gases	Self-contained breathing apparatus
Hands and arms	Handling rough or sharp objects	Leather gloves
	Handling hot objects	Insulated gloves
	Using solvents	Impervious synthetic gloves
Feet and legs	General wear for light object handling Handling heavy objects	Safety-toe shoes Metatarsal safety shoes
	Working with corrosive liquids	Safety-toe boots
	Underground work	Safety-toe synthetic boots
Trunk and full body	Hot or corrosive liquids	Synthetic apron
	Punctures, impact, or cuts	Canvas or leather kickback apron or metal mesh apron
	Fire or explosion	Full-body suit made of NOMEX
	Arc Flash	Arc flash PPE to meet the arc flash hazard category of electrical equipment. PPE types and ratings shall be as defined in NFPA 70E.
Fall protection/ rescue	Working from an elevated structure or platform without standard railings	Safety belt and lanyard
	Vessel entry	Harness and lifeline or wristlets and lifeline
	Suspended scaffolds	Lifeline, safety belt/lanyard

Source: California Department of Industrial Relations, 2011

UXO Identification, Training and Reporting Plan

The Applicant will prepare a UXO Identification, Training and Reporting Plan to properly train all site workers in the recognition, avoidance and reporting of military waste debris and ordnance. The plan will contain the following:

- A description of the training program outline and materials, the qualifications of the trainers, and identification of available trained experts that will respond to notification of discovery of any ordnance (unexploded or not);
- A Work Plan to recover and remove discovered ordnance, and complete additional field screening, possibly including geophysical surveys to investigate adjacent areas for surface, near surface or buried ordnance in all proposed land disturbance areas; and
- MEC avoidance and construction support activities will be conducted by personnel with UXO Technician training and appropriate documentation, in accordance with Department of Defense Explosives Safety Board (DDESB) Technical Paper 18 (DDESB 2004). The typical UXO escort will consist of a UXO II or UXO III for MEC and anomaly avoidance. For MEC support during construction activities, a two-person UXO team consisting of a minimum of two qualified UXO personnel (one UXO Technician III and one UXO Technician II) may provide on-site UXO standby support.

Fire Protection and Prevention Plan

The Rio Mesa SEGF will rely on on-site fire protection systems and local fire protection services. A Fire Protection and Prevention Plan will be developed and followed throughout all phases of construction. The specified firefighting equipment will be provided to site personnel.

During construction, the permanent fire protection system will be placed in service as early as practicable. An interim fire protection system will be in place during construction until the permanent system is completed. The fire protection systems for Rio Mesa SEGF are described in Section 3.5.10. The natural gas fuel handling system is summarized in Section 5.16.3, and described in detail in Section 4.0, Natural Gas Supply. Construction fire regulations discussed in 8 CCR, §§1620 *et seq.* will be followed as necessary to prevent construction fires. Applicable local fire requirements include:

- 1998 Edition of California Fire Code and all applicable NFPA standards (24 CCR Part 9)
- California Fire Code Standards
- California Building Code Title 24, California Code of Regulations (24 CCR §§ 3 *et seq.*)

Special attention will be paid to operations involving open flames, such as welding, and use of flammable materials. Personnel involved in such operations will have appropriate training. A fire watch utilizing appropriately classed extinguishers or other equipment will be maintained during hot work operations. Site personnel will not be expected to fight fires past the incident stage. The local responding fire officials will be given information on the site hazards and the location of these hazards, and the information will be included in the emergency response planning.

Materials brought on site must conform to contract requirements, insofar as flame resistance or fireproof characteristics are concerned. Specific materials in this category include fuels, paints, solvents, plastic materials, lumber, paper, boxes, and crating materials. Specific attention will be given to compressed gas, fuel, solvent, and paint storage. Electrical wiring and equipment located in inside storage rooms used for Class I liquids will be stored in accordance with the requirements of electrical codes and safety requirements. Outside storage areas will be graded to divert possible spills away from buildings and will be kept clear of vegetation and other combustible materials. Precautions will be taken to protect storage areas against tampering where necessary.

On-site fire prevention during construction will consist of portable and fixed firefighting equipment. Portable firefighting equipment will consist of fire extinguishers and small hose lines in conformance with Cal-OSHA and NFPA for the potential types of fire from construction activities. Periodic fire prevention inspections will be conducted by the contractor's safety representative. The Project's administrative control, warehouse, and maintenance building, the heliostat assembly building, the plant water treatment building, and other structures will be equipped with fixed fire suppression systems and portable fire extinguishers as required by the local fire department.

Fire extinguishers will be inspected routinely and replaced immediately if defective or in need of recharge. All firefighting equipment will be conspicuously located and marked, with unobstructed access provided. A water supply of sufficient volume, duration, or pressure to operate the required firefighting equipment will be provided on site. Designated, approved storage areas and containers for flammable materials will be used with adequate fire control services.

Valley Fever

Coccidioidomycosis or "Valley Fever" (VF) is primarily encountered in southwestern states, particularly Arizona and California. It is caused by inhaling the spores of the fungus *Coccidioides immitis*, which are released from the soil during soil disturbance (e.g., during construction activities) or wind erosion. There is potential for Valley Fever to impact workers during construction of the proposed project. To minimize exposure of workers and the public to VF during construction activities, the construction contractor will employ dust mitigation measures. See also Air Quality, Section 5.1 for more about dust control measures.

Plant Operational Safety Program

The potential worker hazards during Rio Mesa SEGF operation are listed in Table 5.16-4.

Table 5.16-4
Potential Worker Hazards during Project Operation and Maintenance

Activity	Potential Hazard
Generation enclosure	High voltage
Operations building	High voltage, repetitive trauma
Transformer	Electrocution, flash burns
Compressor	Fire, noise, temperature, rotating equipment, pressure

Table 5.16-4
Potential Worker Hazards during Project Operation and Maintenance

Activity	Potential Hazard
Chemical storage	Chemical splashes, burns, reactions, gases, vapors, fumes, injury due to ingestion, inhalation, or dermal contact
Machinery, general	Noise, temperature extremes, rotating equipment, electrocution
Elevated work	Slips/trips/falls
Hot work (welding/cutting)	Flash burns, explosion, thermal burns, toxic welding fumes
Equipment operation (motor vehicle and heavy equipment use)	Noise exposure, vehicle accidents, load hazards, induced current
Fueling and working with flammable and combustible liquids	Fire, explosion, spills, environmental contamination
Transmission lines/ transformer station - working on electrical equipment and systems	Slips/trips/falls, contact with live electricity and energized equipment, electrocution, flash burns
Maintenance of high-pressure steam and air systems	Injury from failure of pressurized system components or unexpected pressure release
General project operation activities	Heat and cold stress, biological hazards, noise exposure, dust exposure, injury to head, eyes/face, body, foot, and skin, ergonomic injuries, exposure to hazardous materials

Source: California Department of Industrial Relations, 2011

Programs that address these hazards will include:

- regular employee education and training in safe work practices for general and particular task areas;
- communication of hazards in accordance with federal and state standards;
- accident and incident evaluations;
- administrative safety procedures;
- confined-space entry procedures;
- emergency response;
- fire prevention and fire response;
- security; and
- maintenance of safety performance data.

All operations personnel will be provided with written safety guidance. All construction safety programs and procedures that apply to facility operations will be incorporated into the Plant Operational Safety Program.

Operations Injury and Illness Prevention Program

The primary mitigation measures for worker hazards during operation are contained in the IIPP, which is required by 8 CCR §3203. The written IIPP contains the information listed below.

- A list of the person(s) with authority and responsibility for implementing the program.
- A system for verifying that employees comply with safe and healthful work practices.
- A system for communicating with employees in a readily understandable form.
- Procedures for identifying and evaluating workplace hazards, including inspections, to identify hazards and unsafe conditions.
- Methods for correcting unhealthy/unsafe conditions in a timely manner - when the hazard is discovered and/or when there is an imminent danger.
- A training program for:
  - establishing the program initially;
  - new, transferred, or promoted employees;
  - new processes and equipment; and
  - supervisors.
- Methods of documenting inspections and training and maintaining records for three years.

The IIPP designates a safety representative who is responsible for implementing the program. It also describes safety training for new employees and procedures for tracking safety training. The IIPP provides JHAs for each job. The JHA will identify safety hazards related to each work task and establish procedures for avoiding, correcting, reporting, and notifying employees of these hazards.

Operational Written Safety Programs

The IIPP is used in conjunction with other written safety programs. These programs may include those listed below.

- Accident/Incident Reporting Procedures
- Blood-borne Pathogens Exposure Control Program
- Best Management Practices (BMPs) for Herbicide Storage and Application
- Chemical Hygiene Plan
- Code of Safe Practices for Equipment and Operation
- Compressed Gas and Air Handling Systems
- Confined-Space Entry Procedures
- Electrical Safety Procedures

- Emergency Action Plan
- Emergency Response Procedures
- Fall Protection Program
- Fire Protection and Prevention Plan
- First-Aid/Cardiopulmonary Resuscitation/Automated External Defibrillator Program
- Hand Tools and Equipment Guarding Safety Procedures
- Hazard Communication Plan (including Proposition 65 Requirements)
- Hazardous Materials Handling Procedures
- Hazardous Waste Awareness Training
- Hearing Conservation Program
- Heat Stress Protection Plan
- Heavy Equipment Procedures
- Hoist/Chain/Wire Rope/Webs/Rope Slings/Cranes
- Hot Work Program (Welding, Cutting, and Brazing)
- Industrial Hygiene Program
- Industrial Truck (Forklifts) Safety
- Ladders, Scaffolds, and Work Platforms
- Lock Out/Tag Out Procedure
- Motor Vehicle Safety
- PPE Program
- Portable Electric and Pneumatic Tools
- Preventing Slips, Trips, and Falls
- Repetitive Stress Injuries/Ergonomics/Lifting Hazards
- Respiratory Protection Program
- Safety and Housekeeping Inspection Program
- Safety Committee and Toolbox/Tailgate Safety Meetings
- Security Program
- Stop Work Authority
- Signs, Tags, and Barricades
- Tools (Power- and Hand-operated)

These programs will be reviewed annually to determine if they are affected by any new regulations and to evaluate the effectiveness of their implementation. Other written programs or plans may relate to worker safety in that they enable work to be performed in a safe manner. These include standard operating procedures, worker qualifications programs, and site security.

Heat Stress Protection Plan

All Rio Mesa SEGF workers will be instructed in heat illness prevention. The Applicant will prepare a Heat Stress Protection Plan per OSHA regulations (8 CCR § 3395).

Operations Safety Training Programs

All Rio Mesa SEGF workers will be instructed regarding their responsibility for safe conduct of their work. These instructions will be given, in part, at the time the employee is first hired and as an ongoing training program for hazard recognition and avoidance.

Workers will be instructed in the safety regulations pertinent to their employment tasks. Safe working conditions, work practices, and PPE requirements will be communicated as indicated below.

- New employees will receive safety training orientation.
- Weekly safety meetings will be held with employees.
- Toolbox/tailgate safety meetings will be conducted periodically for each crew. General safety topics and specific hazards that may be encountered will be discussed. Comments and suggestions from all employees will be encouraged.
- Regularly scheduled safety meetings will be held for supervisors.
- Hazard communication training, including California Proposition 65 warnings and discharge prohibitions, will be conducted as new hazardous materials are introduced into the workplace.
- Material Safety Data Sheets (MSDSs) will be provided for all appropriate chemicals. A bulletin board with required postings and other information will be maintained at the plant site.
- Warning signs will be posted in hazardous areas.

Safety training will be provided to each new employee as indicated below.

- Safe work rules for the Rio Mesa SEGF will be explained to each new employee.
- A copy of the applicable Safe Work Practices will be given to each new employee. The provisions will be incorporated into training for the qualifications programs so that employees may fully understand what the protective provisions mean.
- The Hazard Communication Program and other applicable training and requirements for personal protection for the types of hazards that may be encountered at the Rio Mesa SEGF will be explained to employees. This training will be documented.

- Unusual hazards that are found on site will be explained in detail to each new employee, including any specific requirements for personal protection.
- Safety requirements for the new employee's specific job assignment will be explained by the foreman upon initial assignment and upon any reassignment.

Operations Personal Protective Equipment Program

Personal protective clothing and equipment will be used during specified work operations. Each employee will be provided the information listed below pertaining to protective clothing and equipment, which includes:

- proper use and maintenance;
- when the protective clothing and equipment are to be used;
- benefits and limitations; and
- when and how the protective clothing and equipment are to be replaced.

Each employee will be checked for proper equipment fit and to assess whether they are medically capable of wearing the equipment. All safety equipment will meet NIOSH or American National Standards Institute (ANSI) standards and will have all required markings, numbers, or certificates of approval. Table 5.16-3 contains a list of the basic protective equipment that will be used at the Rio Mesa SEGF.

Hazardous Materials Handling and Storage

Various hazardous materials will be stored and used during construction and operation of the Rio Mesa SEGF. The storage, handling, and use of all chemicals will follow applicable LORS to minimize risks to workers. All hazardous materials will be appropriately labeled and stored in designated hazardous materials storage areas. Bulk hazardous materials will be stored in aboveground storage tanks. Other hazardous materials will be stored in their delivery containers. Hazardous materials storage and chemical feed areas will be surrounded by containment or curbing to contain leaks and spills. The containment areas will be sized to hold an appropriate volume (considering the potential for the local hazard contingencies) as designated by a California registered Professional Engineer. At a minimum, this volume will equal the full contents of the largest single tank plus sufficient capacity for precipitation from a 25-year, 24-hour storm event in the case of outdoor storage tanks.

Safety showers and eyewash stations will be provided in or adjacent to corrosive chemical storage areas and in required areas in accordance with regulatory requirements. PPE and spill response equipment for the exposure and cleanup will be readily available for plant personnel for use during spill containment and cleanup activities. A hazardous material emergency response team trained in handling these emergencies and accidental releases of hazardous materials will be available to the Rio Mesa SEGF through the duration of facility operations. Emergency contact numbers will be available for spill response contractors and for notification to local agencies of spill incidents. These and other procedures will be detailed in the Rio Mesa SEGF Emergency Action Plan.

Herbicides and pesticides may be stored and applied on the proposed project site, as needed. Exposure to workers via inhalation and ingestion of dusts containing herbicides and pesticides poses a health risk. The proposed project will prepare BMPs for the storage and application of herbicides and pesticides onsite according to applicable regulations.

Operations Emergency Action Plan/Emergency Response Plan

In addition to the incorporation of various safety and environmental features and design measures to minimize emergencies and their effects on public and worker safety, a site-specific Emergency Action Plan/Emergency Response Plan will be developed for the project site. A typical Emergency Action Plan/Emergency Response Plan outline is provided in Table 5.16-5. The Emergency Action Plan/Emergency Response Plan is designed to address potential emergencies, including hazardous materials releases, fires, earthquakes, bomb threats, pressure vessel ruptures, and other catastrophic events. The plan will describe evacuation routes, warning devices, points of contact, assembly areas, responsibilities, and other actions to be taken in the event of an emergency. The plan will have a layout map and a fire extinguisher list and will describes arrangements with local emergency response agencies for responding to emergencies.

Table 5.16-5
Sample Emergency Action/Emergency Response Plan Outline

Section Number	Description	Section Number	Description
1.0	**Introduction**	4.6	Bomb Threat
1.1	Purpose	4.7	Emergency Plant Shutdown
1.2	Scope	4.8	Site Security
2.0	**Responsibilities**	4.9	Emergency Medical Treatment and First Aid
2.1	Incident Command System	4.10	Decontamination
	Emergency Response Coordinator	4.11	Documentation and Recordkeeping
	Emergency Evacuation Coordinator	4.12	News Media
	Alternate	4.13	Emergency Notification List
	Safety Coordinator	4.14	Emergency Telephone Numbers List
2.2	Position Description Assignments	**5.0**	**Reference Procedures**
	Construction/Facility Manager	5.1	Evacuation Plan
	Construction/Facility Supervisor	5.2	Emergency Equipment Locations
	Operators	5.3	Fire Extinguisher Locations
	Health and Safety Manager	5.4	Security
	Security	5.5	Accident Reporting and Investigation
3.0	**Response and Notification Plan (Points of Contact)**	5.6	Lockout/Tagout
3.1	Supervisor/Emergency Coordinator	5.7	Hazard Communication
3.2	Health and Safety Manager	5.8	Spill Containment and Reporting
4.0	**Response Procedures**	5.9	First Aid and Medical Response
4.1	Evacuation Routes and Procedures	5.10	Respiratory Protection
4.2	Accidents Involving Serious Injury and/or Death	5.11	Personal Protective Equipment
4.3	Fire	5.12	Sanitation
4.4	Hazardous Waste or Chemical Spills	5.13	Work Site Inspections
4.5	Earthquake		

Fire Prevention Plan

The Fire Prevention Plan will provide for fire protection practices, including routine inspections of the Rio Mesa SEGF by the designated safety representative. The plan will require prompt action to correct situations deemed to be a fire hazard. In addition, the plan will identify firefighting equipment and systems at the plants and methods to safely store flammable and combustible materials. Facilities will be designed by a California Registered Fire Protection Engineer and fire protection equipment will be installed and maintained in accordance with all applicable NFPA standards and recommendations. Fire reporting protocols (based on the size of the fire) and investigation protocols will be detailed in the Fire

Prevention Plan. Fire protection measures will also include fire prevention measures to prevent the inception of fires.

The comprehensive on-site fire protection system and procedures program will be designed and implemented to protect both personnel and property. The program will include the information provided below.

- Names and/or job titles responsible for maintaining equipment and accumulation of flammable or combustible material control
- Procedures in the event of fire
- Fire alarm and protection equipment
- System and equipment maintenance
- Monthly inspections
- Annual inspections
- Firefighting demonstrations
- Housekeeping practices
- Training

Fire Suppression

The fire protection system will be designed and installed in accordance with code requirements to mitigate fire hazards, reduce potential property loss and protect personnel. Automatic and manual fire protection systems will be provided as necessary. The fire protection system will incorporate a fire alarm system with means to automatically or manually detect and suppress fires until they can be extinguished by qualified onsite or offsite personnel. The equipment identified below will be provided for the common area and in each of the three plants.

- A 2-hour dedicated fire water storage tank, two main fire water pumps (one electric-motor-driven and one diesel-engine driven) and a jockey pump. Automatic start for the fire pumps. Once started, the pump(s) will continue to run until manually stopped.
- Structural steel metal enclosure for the fire pumps. The enclosure will have a fire wall separating the diesel and electric fire pumps.
- An underground fire main header around the power block and in the common area with yard hydrants. Fire hydrants will be spaced at approximately 250-foot intervals.
- Sprinkler and fixed spray systems designed and installed in accordance with NFPA 13 and NFPA 15, respectively. Gaseous clean agent suppression systems will be designed and installed in accordance with NFPA 2001.

- A proprietary, multiplex, addressable, smoke and fire detection system, with local structure fire alarms, automatic fire detectors, and fire signaling panels as required by design codes and in accordance with NFPA 72.
- Portable fire extinguishers will be located throughout the common area and each plant. These extinguishers will be sized, rated, and spaced in accordance with NFPA 10.
- All fire protection equipment and components will be Underwriters Laboratories (UL) listed (or preferably Factory Mutual [FM] approved) for fire protection service, where possible.

The Rio Mesa SEGF on-site fire suppression systems will be backed up by fire suppression support from the RCFD. Both fire and emergency service will be provided out of Ripley Fire Station 44 located at 13987 Main Street. The estimated response time to the project site is 14 to 16 minutes. Firewater will be supplied from the firewater distribution system, as described in Section 2.2.12, Fire Protection.

5.16.5 Cumulative Impacts

Health and Safety Programs for construction, operation, and maintenance activities at the Project will be implemented and will comply with applicable LORS addressing worker safety. Past, present, and reasonably foreseeable future projects, including the RSPP, BSPP, PSPP, DSSF, and GSEP, also are subject to LORS addressing worker safety. Therefore, implementation of Health and Safety Programs and compliance with existing LORS will ensure that the incremental effects of the Project on worker safety, when considered together with the effects of past, present, and reasonably foreseeable projects, will not be cumulatively considerable.

5.16.6 Mitigation Measures

The procedures described in this section will provide appropriate mitigation for worker safety and will ensure compliance with all applicable LORS and in a manner that would not cause significant environmental impacts.

5.16.6.1 WORKER SAFETY-1

The Applicant will prepare a Project Construction Health and Safety Health Program containing the following:

- Construction Personal Protective Equipment Program
- Construction Exposure Monitoring Program
- Construction Injury and Illness Prevention Program
- Heat Stress Protection Plan
- Construction Emergency Action Plan
- Construction Fire Prevention Plan

5.16.6.2 WORKER SAFETY-2

The Applicant will prepare an Operations & Maintenance Health and Safety Health Program containing the following:

- Operation Injury and Illness Prevention Plan
- Emergency Action Plan
- Heat Stress Protection Plan
- Hazardous Materials Management Program
- BMPs for Herbicide and Pesticide Storage and Application
- Fire Prevention Plan
- Personal Protective Equipment Program

5.16.6.3 Monitoring Program

Impacts to worker safety during construction and operations of the Project are expected to be minimal. Therefore, extensive monitoring programs are not required. Monitoring of worker safety during construction and operation of the Project will be conducted in accordance with OSHA requirements as well as monitoring and reporting requirements in the appropriate permits that will be obtained for construction and operation.

5.16.7 Involved Agencies and Agency Contacts

Agencies with the jurisdiction to issue applicable permits and/or enforce LORS related to worker safety at the Project are shown in Table 5.16-6.

Table 5.16-6
Agency Contacts

Agency	Contact	Address	Telephone
Cal-OSHA	Consultation Services/Compliance Officer	464 W. 4th Street Suite 339 San Bernardino, California 92401	(909) 383-4567
County of Riverside DEH, HMMD CUPA	Hazardous Materials Supervisor-Nick Crain	47-950 Arabia Street Indio, California 92503	(760) 863-8976
RCFD	Chief John R. Hawkins	RCFD 12300 Market Street, Suite 150 Riverside, California 92501	(951) 955-4777
RCFD	Staff	Blythe Fire Station #43 140 Barnard Street Blythe, California 92225	(760) 921-7822

Table 5.16-6
Agency Contacts

Agency	Contact	Address	Telephone
RCFD	Fire Prevention	RCFD 12300 Market Street, Suite 150 Riverside, California 92501	(951) 940-6900
BLM	Cedric Perry	Bureau of Land Management 22835 Calle San Juan de Los Lagos Moreno Valley, CA 92553-9046 cperry@blm.gov	(951) 697-5200
CEC	Pierre Martinez Siting Project Manager	1516 Ninth Street Sacramento, CA 95814 PMartine@energy.state.ca.us	(916) 651-3765

Sources: Riverside County DEH, HMMD, 2011; Cal-OSHA, 2011; RCFD, 2011

Acronyms:

BLM = Bureau of Land Management
Cal-OSHA = California Occupational Safety and Health Administration
CUPA = Certified Unified Program Agency
DEH = Department of Environmental Health
HMMD = Hazardous Materials Management Division
LORS = Laws, Ordinances, Regulations, and Standards
RCFD = Riverside County Fire Department

5.16.8 Permits Required and Permit Schedule

The permits required for the Project are listed in Table 5.16-7. A HMBP will be developed prior to construction of the proposed improvements and will be updated prior to operation.

Table 5.16-7
Applicable Permits

Responsible Agency	Permit/Approval	Schedule
Cal-OSHA	Trenching or Excavation Permit, Tower Cranes/Erection of a fixed Tower Crane Permit, Scaffolding Permit, Pressure Vessel Permit	Prior to commencing construction activity submit completed permit application to the San Bernardino Cal-OSHA office; permit will be issued within 24 hours
RCFD	Fire Department requirements, storage of hazardous materials, flammables and combustible liquids, compressed gases and lead acid battery systems. Fire Protection Systems Permit (Fire Code compliance and NFPA conformity)	Coordinate with RCFD before storing these materials on site Compliance and conformity with Fire Code and NFPA (Ordinance 787)
Riverside County DEH, HMMD, CUPA	Hazardous Waste Generator Program Permit Hazardous Materials Business Plan	30 days prior to generation of hazardous waste and storage of hazardous materials on site

Table 5.16-7
Applicable Permits

Responsible Agency	Permit/Approval	Schedule
BLM	Herbicide/Pesticide use permit.	Prior to construction.

Sources: Cal-OHSA 2011; Riverside County DEH, HMMD 2010, RCFD, 2011

Acronyms:

BLM = Bureau of Land Management
Cal-OSHA = California Occupational Safety and Health Administration
CUPA = Certified Unified Program Agency
DEH = Department of Environmental Health
HMMD = Hazardous Materials Management Division
NFPA = National Fire Protection Association
RCFD = Riverside County Fire Department

5.16.9 References

American Conference of Governmental Industrial Hygienists. 1996. Threshold Limit Values (TLV) for Chemical Substances and Physical Agents and Biological Exposure Indices.

California Code of Regulations. ND. Title 8. "General Industry Safety Orders, Construction Safety Orders, and High Voltage Electrical Safety Orders."

California Department of Industrial Relations. 2011a. Information downloaded from http://www.dir.ca.gov/occupational_safety.html.

California Department of Industrial Relations. 2011b. Information downloaded from http://www.dir.ca.gov/dosh/DistrictOffices.htm

California Department of Toxic Substances Control. 2011. Information downloaded from http://www.dtsc.ca.gov/.

California Environmental Protection Agency (Cal-EPA). 2011. Website http://www.calepa.ca.gov/.

Code of Federal Regulations. ND. Title 29 Part 1910. "Construction Safety Orders."

Neumann, Jason. 2011. Riverside County Fire Department. Telephone conversation with Darin Neufeld of URS Corporation and Jason Neumann, Fire Captain, Strategic Planning Division. August 18.

Adequacy Issue: Adequate ____ Inadequate ____

DATA ADEQUACY WORKSHEET

Revision No. 0 Date ____

Technical Area: **Worker Safety** Project: ____ Technical Staff: ____

Project Manager: ____ Docket: ____ Technical Senior: ____

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Page 5.16-7, Section 5.16.3 Page 5.16-7, Section 5.16.4		
Appendix B (g) (11) (A)	A description of the safety training programs which will be required for construction and operation personnel.	Page 5.16-7, Section 5.16.4.1		
Appendix B (g) (11) (B)	A complete description of the fuel handling system and the fire suppression system.	Page 5.16-2, Section 5.16.2 Page 5.16-7, Section 5.16.4.1 Section 4.0		
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows:	Page 5.16-7, Section 5.16.4.1		
	Construction Health and Safety Program: * Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509);	Page 5.16-7, Section 5.16.4.1		
	* Fire Protection and Prevention Plan (8 Cal. Code Regs., § 1920);	Page 5.16-7, Section 5.16.4.1		
	* Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522)	Page 5.16-7, Section 5.16.4.1		
	Operation Health and Safety Program: * Injury and Illness Prevention Program (8 Cal. Code Regs., § 3203);	Page 5.16-7, Section 5.16.4.1		
	* Fire Prevention Plan (8 Cal. Code Regs., § 3221);	Page 5.16-7, Section 5.16.4.1		
	* Emergency Action Plan (8 Cal. Code Regs., § 3220);	Page 5.16-7, Section 5.16.4.1		
	Personal Protective Equipment Program (8 Cal. Code Regs., §§ 3401-3411).	Page 5.16-7, Section 5.16.4.1		

Adequacy Issue: Adequate ____ Inadequate ____ **DATA ADEQUACY WORKSHEET** Revision No. 0 Date ____

Technical Area: **Worker Safety** Project: ____ Technical Staff: ____

Project Manager: ____ Docket: ____ Technical Senior: ____

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Page 5.16-2, Section 5.16.2 Table 5.16-1		
Appendix B (i) (1) (B)	Tables which identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Page 5.16-2, Section 5.16.2, Table 5.16-1 Page 5.16-24, Section 5.16.8, Table 5.16-7		
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and also provide the name of the official who will serve as a contact person for Commission staff.	Page 5.16-23, Section 5.16.7, Table 5.16-6		
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Page 5.16-24, Section 5.16.8, Table 5.16-7		